

*** ORIGINAL LETTER DATED 04-11-2003 ***

Ms. Mary Leath, Chief Deputy Director
Arkansas Department of Environmental Quality
P.O. Box 8913
Little Rock, Arkansas 72219-8913

Re: NPDES Permit Program Review - Fiscal Year 2002

Dear Ms. Leath:

In accordance with the Memorandum of Agreement between the Arkansas Department of Environmental Quality (ADEQ) and the U.S. Environmental Protection Agency (EPA), Region 6, enclosed is the End-of-Year (FY02) report concerning the administration of the permitting portion of the ADEQ program by the State of Arkansas. The report includes our findings on the Mid-Year and End-of-Year review of the permitting and pretreatment portions of the State of Arkansas' NPDES program. The Mid-Year review was conducted on April 17, 2002, and the End-of-Year review was held November 6-7, 2002. EPA appreciates the time and effort your staff devoted to assisting EPA staff during this evaluation.

Overall, EPA is pleased with fact that the State has met the FY2004 goal of the combined major/minor permit backlog of 10% or less two years early. This goal was achieved in part by the State issuing some of the chronic backlogged permits. The permitting program has functioned as a very efficient team over the past year. In addition to the permitting group, ADEQ maintains an effective pretreatment program with gains in its pretreatment program backlog and commendable outreach programs and workshops.

There are programmatic issues of concern noted in the review. The GP Crossett permit, is 11 years past expiration, and the permittee continues to discharge under old technology based regulations. In spite of the State meeting national goals for permit backlog, there are six chronic backlogged permits that need to be reissued. Programmatic concerns also exist for total residual chlorine controls at facilities that use chlorine as a bacteria control agent but do not dechlorinate their effluent prior to discharge.

We look forward to receiving your response within 45-days of receipt of this report. As always, the Region appreciates your continued efforts in the support and administration of the NPDES program. If you should have any questions, please do not hesitate to contact me at (214) 665-7170, or have your staff contact Larry Giglio at (214) 665-6639. Thank you for your cooperation.

Sincerely yours,

SIGNED BY

Jack V. Ferguson, P.E.
Chief
NPDES Permits Branch

Enclosure

cc: Chuck Bennett, Chief, Water Division, ADEQ, w/enclosure
Marysia Jastrzebski, NPDES Branch Manager, ADEQ, w/enclosure
Bruce Kirkpatrick, Assistant Chief, Water Division, ADEQ, w/enclosure
Morteza Shafii, Acting NPDES Permits Supervisor, ADEQ, w/enclosure

**U.S. ENVIRONMENTAL PROTECTION AGENCY'S
FISCAL YEAR 2002 REVIEW
OF THE
STATE OF ARKANSAS' ADMINISTRATION
OF THE
NPDES PERMIT PROGRAM**

OCTOBER 1, 2001 - SEPTEMBER 31, 2002

FEBRUARY 24, 2003

**Submitted by
Larry Giglio**

**Oversight Team (6WQ-PO)
Water Quality Protection Division**

SUMMARY

The Memorandum of Agreement (MOA) authorized November 1, 1986 and amended January 30, 1995 between the United States Environmental Protection Agency (EPA) and the Arkansas Department of Pollution Control and Ecology (ADPC&E), defines the manner in which the National Pollutant Discharge Elimination System (NPDES) will be administered by the State of Arkansas Department of Environmental Quality (ADEQ). EPA shall, as part of its statutory overview duty, assure that such administration is consistent with the MOA and all applicable requirements embodied in current regulations, policies and Federal law.

The EPA conducted the Mid-Year audit April 17, 2002 and the End-of-Year November 6-7, 2002. This report will serve to satisfy the above requirements for FY2002. The following is that report.

PROGRAM STRENGTHS

1. ADEQ is to be congratulated for meeting two-years early the CY2004 national goal of reducing the combined major-minor permit backlog to less than 10%. As of the November 8, 2002 permits issuance forecast tool (PIFT) run, ADEQ has a 7.3 percent major permit backlog, a 2.9 percent minor permit backlog and a combined major-minor backlog of 3.5 percent.
2. EPA appreciates ADEQ's commitment to move forward with the reissuance of chronic backlogged permits. These include the City of Fort Smith "P" Street, Green Bay Packaging, City of Conway, Union Pacific Railroad, City of Siloam Springs, El Dorado Chemical Company, City of Wynne, and the City of Hope.
3. The ADEQ pretreatment program activities are many, varied and done quite well. There has been a reasonable effort made in working towards eliminating the Pretreatment Program modification backlog. Additionally, the pretreatment program has expanded the outreach activities this past year with three commendable programs. Silver and mercury best management practices (BMP) workshops, three pollution prevention (P2) and wastewater treatment option workshops and a pretreatment portion of the ADEQ website has been established.
4. ADEQ has done an excellent job in responding to comments received during the 30-day public notice period. Responses were timely, specific and comprehensive.

SIGNIFICANT PROGRAMMATIC ISSUES OF CONCERN

The following concerns are items that EPA believes needs immediate attention and a planned time-line for action.

1. RE-ISSUANCE OF EXPIRED PERMITS

The timely re-issuance of permits is an essential part of an effective NPDES permit program. Several NPDES permits in Arkansas however are seriously past permit expiration dates. The following six permits are in excess of two-years past expiration dates, and one permit is greater than 11-years.

- Georgia Pacific - Crossett (AR0001210) Expired October 1991

The total maximum daily load (TMDL) has been approved. Because the permit is seriously outdated, EPA recommends that ADEQ now draft and prepare the permit while finalizing the update to the water quality management plan (WQMP). The current permit is eleven years old, does not have the latest “Cluster Rule” technology requirements, thus is operating with outdated permit requirements giving it a competitive advantage over other paper mills using the newer rules, and has interstate issues with Louisiana. Region 6 recently issued International Paper in Bastrop, LA, a permit with a similar situation, and requests that ADEQ’s permit be consistent with the Region 6 draft.

- City of West Memphis (AR0022039) Expired August 1995

In the FY2001-Program Review, EPA commented that this permit needs to be issued with fecal coliform bacteria limits. In their response to that review, ADEQ states that to do so would require the facility to install chlorination. ADEQ further argued that the discharge is into the Mississippi River, the dilution is so large that there is no potential for violation of water quality standards, and the permit will not be issued with fecal coliform bacteria limitations. The Arkansas State Water Quality Standards (WQS), Regulation 2, Section 2.507, Bacteria, states that “No mixing zones are allowed for discharges of bacteria.” Also, this rationale is not supported by the State’s Continuing Planning Process (CPP). EPA requests that this permit be issued with bacteria limits, or appropriate changes be made to the CPP.

- City of Truman (AR0035602) Expired October 1996

In the FY2001-Program Review, EPA commented that the permit needed to be issued with fecal coliform bacteria limits. ADEQ responded to that review stating that the facility uses a three-cell lagoon system that has a history of low fecal coliform bacteria. Further, ADEQ reports that a survey performed of the receiving stream in October 1990 found an abundant mussel population with excellent diversity. The position of EPA in this permit is similar to the West Memphis permit above. Bacteria control is essential in all discharges when standards require it. The State's WQS require the inclusion of fecal coliform bacteria limits. EPA requests that this permit be issued.

- Alcoa (AR0000582) Expired May 1995
- Reynolds Metal (AR0001112) Expired August 2000

EPA requested that these permits be issued in the FY2001-Program Review. In remarks to that review, ADEQ responded that both facilities are under Compliance Administrative Orders (CAO), and that these conditions override any new permit. EPA disagrees that the CAO precludes the need for a new NPDES permit. EPA still encourages issuance of these permits.

- Fayetteville (AR0020010) Expired November 1997

Arkansas has stated that they will not draft this permit until an approved TMDL is issued. There are interstate water issues with Oklahoma, and the facility has asked for an increased limit to loadings. The reissuance of this permit has encountered problems associated with the existing design and actual plant flow and a planned plant expansion. This has created concerns with local environmental groups and has effectively stalled the reissuance of this permit. The decision to move forward with reissuance of this permit at this time will need to come from upper management within the ADEQ. EPA encourages ADEQ to move forward with reissuance of this permit at this time.

2. TOTAL RESIDUAL CHLORINE

The implementation of toxicity testing for evaluating the effects of total chlorine residual (TRC) in discharges that use chlorine for effluent treatment as contained in the CPP may impose a significant cost burden on permittees. The methodology that the CPP uses renders typically collected toxicity testing samples as not representative of the actual discharge. Sampling and testing would require on-site or lab testing with continuous

chlorine dosing to be representative of the effluent in the receiving stream. EPA recommends either adoption of a “no-measurable” standard, or implementation of a “no-measurable” and adoption of the 40 CFR Part 136 regulations for TRC measurement.

3. AMMONIA

ADEQ has received a recommendation to adopt fish early life stage ammonia standards as part of EPA’s recommendations for the Triennial Standards Review from the Region 6 Ecosystems Branch. The EPA Oversight Section of the Permits Branch has provided ADEQ long-term ammonia data on every major POTW in Arkansas. The NPDES Permits Branch also encourages ADEQ to adopt the standards, or in the alternative, an implementation strategy that requires ammonia discharges not to exceed 4 mg/l at the edge of the mixing zone for 30-day average, 6 mg/l at the edge of the mixing zone daily maximum year-round.

ADEQ PERMITS PROGRAM ACTION ITEMS FOR FY 2003:

1. EPA recommends that ADEQ draft Georgia Pacific Crossett (AR0001210) expired October 1991, Alcoa - Bauxite (AR0000582) expired May 1995, City of West Memphis (AR0022039) expired September 1995, City of Truman (AR0035602) expired October 1996, The City of Fayetteville (AR0020010) expired November 1997, and Reynolds Metals - Hurricane (AR0001112) expired August 2000. These permits are at least two-years past their expiration date, and need to be reissued.
2. EPA recommends that ADEQ adopt and implement specific numeric ammonia limits. During 2002, EPA and ADEQ arrived at an acceptable procedure establishing how permits would protect against toxicity due to ammonia discharges. While this procedure addresses the issue of ammonia toxicity, the methodology is not as strong nor as proactive as the adoption of national EPA guidelines for specific numeric ammonia criteria. EPA encourages ADEQ to consider adoption of the aquatic life toxicity numeric criteria (and limits based on them) for ammonia specified in EPA’s letter “Consideration for Triennial Standards Review”, June 21, 2002, from Richard Hoppers, EPA, to Chuck Bennet, ADEQ. In the alternative, EPA recommends ADEQ adopt implementation of year round ammonia limits of 4/6 mg/l.
3. EPA recommends implementation of a no-measurable limit for total residual chlorine (TRC) at sites that use chlorine for bacteria control. The methodology in the CPP for addressing potential chlorine toxicity through biomonitoring can only be effective where composite samples, taken over a 24-hour period, are continually re-dosed with chlorine,

either in the receiving stream or in the lab. Federal regulations at 40 CFR Part 136 require instantaneous analysis, defined as within 15-minutes of sample collection regulations, to accurately measure total residual chlorine. This eliminates the use of standard toxicity sampling and testing techniques with respect to chlorine.

4. To ensure the continued success of the pretreatment program and its active role in both State and regional outreach programs and activities, EPA recommends ADEQ cross train additional staff member in the pretreatment program.
5. Regulation 2, Section 2.305, Short Term Activity Authorization, needs to be reviewed and consideration given to deleting it. The majority of permits identified in the regulations require a federal permit of some kind and issuing a short term authorization bypasses the permitting process. In addition the regulation is contrary to federal regulations.

TABLE of CONTENTS

Page -a-

EXECUTIVE SUMMARY	Page i
PROGRAM STRENGTHS	Page i
SIGNIFICANT PROGRAMMATIC ISSUES of CONCERN	Page ii
ADEQ PERMITS PROGRAM ACTION ITEMS FOR FY 2003	Page iv
A. INTRODUCTION	Page 1
B. PARTNERSHIP	Page 1
1. Performance Partnership Agreement	Page 1
2. Dates of Previous Program Reviews	Page 2
3. Meeting Dates	Page 2
C. PROGRAM STATUS REVIEW	Page 3
1. Status of Water Quality Management Plan	Page 3
2. Status of Water Quality Standards	Page 3
3. Status of Continuing Planning Process Document	Page 3
4. Precedent Setting Settlements and Administrative Decisions	Page 3
D. LEGAL AUTHORITY	Page 3
1. Program Review Changes	Page 3
2. State Required EPA Regulatory Changes	Page 4
3. ADEQ Tracking Federal Regulations	Page 4
4. Changed Statutes/Regulations	Page 4
5. Statues/Regulations Needing Review	Page 4
E. STAFFING LEVELS	Page 4
F. EPA REVIEW OF ADEQ PRELIMINARY DRAFT PERMITS	Page 5
1. Individual Permits	Page 5
2. Backlog Report	Page 8
3. General Permits	Page 8
G. PUBLIC PARTICIPATION	Page 9
1. Public Hearings	Page 9
2. Requested Public Hearings	Page 9
3. Changes in Public Participation Policies, Practices, and Procedures	Page 9
H. ADEQ PRETREATMENT PROGRAM	Page 9
1. Overview	Page 10
2. Outreach	Page 10
3. Permit Review	Page 11
4. Action Items	Page 11
5. Enumerated Activities	Page 13
I. ADEQ PERMIT FILE REVIEW (ADMINISTRATIVE)	Page 14
1. Mid-Year Review	Page 14
2. End-of-Year Review	Page 14

TABLE of CONTENTS

Page -b-

J.	ADEQ ADMINISTRATIVE PCS AND RECORDS MANAGEMENT REVIEW	Page 15
K.	ADEQ PERMIT FILE REVIEW (TECHNICAL)	Page 15
1.	Mid-Year Review	Page 16
2.	End-of-Year Review	Page 17
3.	Public Notice Review	Page 18
L.	ADEQ WHOLE EFFLUENT TOXICITY (WET) FILE REVIEW	Page 18
1.	Mid-Year Review	Page 18
2.	End-of-Year Review	Page 19
M.	ADEQ RELATED PERMIT ACTIVITIES	Page 20
1.	ADEQ Program Modification/Changes	Page 20
2.	ADEQ Variance Requests	Page 20
3.	New Source Determinations	Page 20
4.	EPA Requests for Permit Issuance, Reissuance, or Modification	Page 20
5.	State Administrative or Court Action	Page 20
6.	ADEQ Public Hearings	Page 20
7.	Permit Re-Classification(s)	Page 21
N.	AMMONIA LIMITS, DISSOLVED OXYGEN, AND TOXICITY	Page 21
O.	NUTRIENTS	Page 22
P.	TOTAL RESIDUAL CHLORINE	Page 22
Q.	SUMMARY	Page 23
1.	Strengths	Page 23
2.	Concerns	Page 23
3.	Recommendations Needing Action From ADEQ	Page 23
	APPENDIX A - FY 2003 EXPIRATION & BACKLOG UNIVERSE	Appendix A
	APPENDIX B - PRETREATMENT ACTIVITIES	Appendix B

A. INTRODUCTION

As cited in the MOA, executed between both agencies, which became effective November 1, 1986, and amended January 30, 1995, EPA is responsible for assuring that Arkansas' discharge permitting program is consistent with all Federal regulations and laws, EPA policies, guidelines and guidance, and adheres to the requirements agreed upon in the MOA.

As specifically used in this report, the State of Arkansas NPDES fiscal year (FY) is from October 1 through September 30. The use of the terms mid-year and end-of-year shall mean the fiscal year. The calendar year (CY) is from January 1 through December 31 and when used in this report it will be designated as to the specific year.

The EPA conducted the previous end-of-year review of the NPDES permitting and administrative programs October 10-11, 2001. The EPA conducted a mid-year review of the ADEQ NPDES permitting and administrative programs on April 17, 2002. The end-of-year review was conducted November 6-7, 2002. Marysia Jastrzebski, NPDES Branch Manager, Morteza Shafii, Acting NPDES Permits Supervisor, and ADEQ NPDES permit engineering staff attended these meetings. Larry Giglio, Evelyn Rosborough, Mike Tillman, Leonard Pardee, Lee Bohme and Anhmai Tran represented the EPA. This report will present the findings for both the FY2002 mid-year and the FY2002 end-of-year reviews in one FY2002 document.

B. PARTNERSHIP

1. During FY2001, ADEQ completed development of a final Performance Partnership Agreement (PPA) which was signed by senior management from ADEQ and EPA on July 20, 2001. The Agreement contains impressive goals and objectives which will help ADEQ focus resources more effectively on critical environmental problems and show more environmental improvement for effort expended. Both EPA and ADEQ plan to keep the PPA current and useful by periodically adding in new programs and priorities. During FY2002 EPA and ADEQ began to address the "Action Items" from the PPA which will continue on into FY2003. ADEQ's effort to continue to include EPA as a partner in these efforts and to search for ways to better address Arkansas environmental challenges is greatly appreciated.

2. Dates of Previous FY2001 EPA NPDES Program Mid-Year and End-of-Year Reviews

The EPA conducted the previous midyear review April 25, 2001 and the end-of-year review October 10-11, 2001.

3. Meeting Dates

Dates of meetings other than mid-year and end-of-year program reviews were:

- Sam Becker, Acting Water Quality Division Director and Jack Ferguson, NPDES Permits Branch Chief EPA met with Marysia Jastrzebski, NPDES Branch Manager and Chuck Bennett, Chief Water Division, ADEQ on February 5, 2002 and discussed NPDES permits backlog and the Magcobar Mine permit.
- Jack Ferguson, NPDES Permits Branch Chief and Paulette Johnsey, NPDES Permits Oversight Team Leader met with Marysia Jastrzebski, NPDES Branch Manager of ADEQ on March 25, 2002 and discussed water quality issues.
- Jack Ferguson, NPDES Permits Branch Chief and Paulette Johnsey, NPDES Permits Oversight Team Leader met with Marysia Jastrzebski, NPDES Branch Manager of ADEQ on July 9, 2002 and discussed permitting strategy for total residual chlorine and ammonia.
- The Water Quality Protection Division hosted a State Program Managers Meeting August 21-22, 2002. NPDES Branch personnel, permitting and oversight and the various states program managers attended. The first day of the meeting was conducted by the NPDES Permits Branch discussing permit issues. The second day was presented by the Ecosystems Branch discussing watershed issues.

C. PROGRAM STATUS REVIEW

1. Status of Water Quality Management Plan

The ADEQ submits updates to the Water Quality Management Plan (WQMP) on a routine basis during the FY.

2. Status of Water Quality Standards (WQS)

Undergoing triennial review, submittal expected FY2003.

3. Status of Continuing Planning Process Document

No changes proposed at this time, but could have some depending on any WQS changes.

4. Number of Precedent Setting Settlements and Administrative Decisions Submitted to EPA - None

D. LEGAL AUTHORITY

1. List changes since last program review - None

2. List of EPA regulatory changes that the State is required to adopt within two-years.

- Effluent Limitation Guidelines for new cooling water intake structures Regulations Addressing Cooling Water Intake Structures for New Facilities (Section 316(b) of the CWA. The Final Rule was published in the Federal Register (FR) on December 18, 2001 [Page 65256].
- Effluent Limitation Guidelines for Coal Mining Point Source Category; Amendments to Effluent Limitations Guidelines and New Source Performance Standards, establishing a Remining subcategory. The Final Rule was published in the FR on January 23, 2002 [Page 3369].
- Effluent Limitations Guidelines and Standards for the Bleached Papergrade Kraft and Soda Subcategory of the Pulp, Paper, and Paperboard Point Source Category. Published in the FR on September 19, 2002 [Page 58990].

3. ADEQ keeps track of and reviews new federal regulations and evaluates whether changes are needed in the state's regulations. This task is accomplished through a cooperative effort between EPA and ADEQ staff. An EPA staff member routinely sends notices (via e-mail) of new federal regulations to ADEQ's managers and permit engineers. Morteza Shafii reviews each notice and makes

recommendations to management whether a change is needed, based on the new federal regulation, in the state regulation. ADEQ's Regulation No. 6 was last updated on November 25, 2000, incorporating new and/or modified federal regulations through January 27, 2000. As noted in the FY2000 End of Year report, ADEQ now has a dedicated staff person responsible for tracking federal regulations and making recommended updates to Regulation 6. Regulation 6 revisions will be initiated as determined appropriate by the Chief of the Water Division. The current 106 Grant Workplan indicates this will occur on at least an annual basis.

4. List of statutes/regulations that have changed.

None.

5. List of statutes/regulations needing review.

Regulation 2, Section 2.305, Short Term Activity Authorization, needs to be reviewed. The rule authorizes short term authorizations that may be made without public notice, and activities that may cause a violation of state WQS. The wording in Regulation 2 describes in detail types of activities that may be granted such authorizations, but then adds that nothing herein shall be intended to supersede existing state and federal permitting processes or requirements. Most of the activities described in Regulation 2 require a federal permit. This regulation is contrary to federal NPDES rules and regulations and needs to be reviewed for deletion.

E. STAFFING LEVELS

Since the last end-of-year review in October, 2001, Mark Bradley, Permit Section Chief, left ADEQ. His duties have been assumed by Morteza (Mo) Shafii, who also continues to draft permits. In addition, during FY2002, ADEQ has lost two permit engineers; Steve Shipp and Gary Griffin. Mr. Shipp has been replaced by Kim Fuller, and Mr. Griffin has been replaced by the hiring of Parviz Mokhpari who started January 6, 2003. Currently, ADEQ has two pretreatment engineers, two stormwater engineers, and four NPDES permit engineers including Mr. Shafii. Additionally there are five support staff. When the Permit Section Chief position is filled, then an additional NPDES permit engineer will be added bringing the NPDES permit engineering staff to six full time employees.

Cross training is very well maintained in the permitting section but the pretreatment section is limited to just the current staff of Rufus Torrence and Allen Gilliam. We believe that the loss of any one of these two would have immediate and substantial impacts on that group's workload. It is recommended that an additional person be cross trained in the work of the pretreatment program.

The output of the permitting section obviously shows that ADEQ has a well balanced and very efficient group. They need to be commended. Mr. Shafii has in a short time become very effective in his new role, and is showing great promise as ADEQ continues to achieve their low permit backlog. His work is also to be commended.

F. EPA REVIEW OF ADEQ PRELIMINARY DRAFT PERMITS

1. Individual Permits

a. MAJOR PERMITS:

During FY2002, EPA reviewed 31 individual major permits. EPA transmitted to ADEQ 31 letters of "No Objection" and 11 letters of "Specific Objections". ADEQ during FY2002 issued 21 major permits. There are 5 major permits currently in public notice, and the majority of these will be issued during the remainder of CY2002. Currently, through the end of October in CY 2003, ADEQ has a 7.3% major permit backlog. EPA is very appreciative of the efforts that ADEQ made to reduce the backlog and they need to be commended for their effort.

ADEQ issued six chronic major permit carry overs. Green Bay Packing (AR0001830) and City of Fort Smith "P" Street (AR0033278) were issued September 30, 2001, City of Siloam Springs (AR0020273) was issued February 28, 2002, Union Pacific Railroad (AR0001775) and El Dorado Chemical (AR0000752) were issued May 31, 2002, City of Hope (AR0038466) was issued July 31, 2002, and City of Wayne (AR0021903) was issued August 31, 2002.

The State committed in the FY2001 - 2002 106 workplan to issuing all expiring permits in FY2002 as well as all major permits which expired prior to October 1, 2000, but were not issued by September 30, 2000, to address the backlog of major permits. In addition, the State committed that no permit would be extended more than one year beyond the expiration date of the permit.

EPA however continues to have strong concerns regarding seven additional chronic major backlog permits. Presently, there are six permits which have been expired and not reissued for at least two-years. Five have been expired for five years or more, and one of these has been expired for 11 years. They are Georgia Pacific - Crossett, the City of West Memphis, the City of Truman, Alcoa - Bauxite, Reynolds Metals - Hurricane, and the City of Fayetteville.

Georgia Pacific - Crossett (AR0001210) Expired October 1991

The TMDL has been approved. Because the permit is seriously outdated, EPA recommends that ADEQ now draft the permit while finalizing the update to the WQMP. The current permit is eleven years old, does not have the latest "Cluster Rule" technology requirements, thus is operating with outdated permit requirements giving it a competitive advantage over other paper mills using the newer rules, and has interstate water issues with Louisiana. Region 6 recently issued International Paper in Bastrop, LA, a permit with a similar situation, and requests that ADEQ's permit be consistent with the Region 6 permit.

City of West Memphis (AR0022039) Expired August 1995

In the FY2001-Program Review, EPA commented that this permit needs to be issued with fecal coliform bacteria limits. In their response to that review, ADEQ states that to do so would require the facility to install chlorination. ADEQ further argued that the discharge is into the Mississippi River, the dilution is so large that there is no potential for violation of water quality standards, and the permit will not be issued with fecal coliform bacteria limitations. The Arkansas State WQS, Regulation 2, Section 2.507, Bacteria, states that "No mixing zones are allowed for discharges of bacteria." Also, this rationale is not supported by the State's CPP.

City of Truman (AR0035602) Expired October 1996

In the FY2001-Program Review, EPA commented that the permit needed to be issued with fecal coliform bacteria limits. ADEQ responded to that review stating that the facility uses a three-cell lagoon system that has a history of low fecal coliform bacteria. Further, ADEQ reports that a survey performed of the receiving stream in October 1990 found an abundant mussel population with excellent diversity. EPA believes, as

stated above, that bacteria control is essential in all discharges when standards require it. The State's WQS require the inclusion of fecal coliform bacteria limits.

Alcoa (AR0000582) Expired May 1995

Reynolds Metal (AR0001112) Expired August 2000

EPA requested that these two permits be issued in the FY2001-Program Review. In remarks to that review, ADEQ responded that both facilities are under Compliance Administrative Orders (CAO), and that these conditions override any new permit. EPA disagrees that the CAO precludes the need for a new NPDES permit.

Fayetteville (AR0020010) Expired November 1997

The state will not draft this permit until an approved TMDL is issued. There are interstate water issues with Oklahoma, and the facility has asked for an increased limit to loadings. The reissuance of this permit has encountered problems associated with the existing design and actual plant flow and a planned plant expansion. This has created concerns with local environmental groups and has effectively stalled the reissuance of this permit. The decision to move forward with reissuance of this permit at this time will need to come from upper management within the ADEQ.

Additionally, CIBA Chemicals (AR0037770), expired March 2000. This permit has a settlement agreement signed July 12, 2001, between EPA and the facility. This facility agreed to a three-year construction of a new treatment plant and an additional one-year period to collect data from the new treatment plant to make a determination of its organic chemicals, plastics, and synthetic fibers (OCPSF) technology based limits. This work is to be completed by mid CY2005. At that time, ADEQ will have the information to draft the permit. This expired permit is included here for historical purposes.

b. MINOR PERMITS:

ADEQ has issued 140 minor permits during FY2002. ADEQ currently has a minor permit backlog of 2.9%. ADEQ is to be commended for this exceptional effort.

2. Backlog Report

In CY2002, ADEQ is meeting EPA's CY2004 backlog goal of 10% for majors and minors combined. We appreciate and commend ADEQ for its efforts and commitment to meeting the national goals. The NPDES Permit Issuance/Expiration Forecast Tool (PIFT) Report dated November 13, 2002 indicates the major permit universe is 109 permits. The backlog for major facilities currently is eight permits (7.3 %). Based on information provided during and since the interview portion of the EOY Program Review, 23 major permits for CY2002 have been issued. Its expected that for November and December, this number could increase by five. The NPDES PIFT Report dated November 13, 2002 indicates the minor individual permit universe is 723 permits. The backlog for minor facilities is 21 permits (2.9 %). The combined major and minor backlog for CY2002 is 3.5%.

Appendix A attached, lists the FY2003 major permit expirations, including the chronic backlog permits mentioned above. The list will serve as a guide to assess permit issuance during FY2003.

3. General Permits

The EPA is pleased with past progress made by the ADEQ regarding the development and issuance of general permits. For FY2002, EPA has received and reviewed the Pipeline Hydrostatic Testing (ARG6700000). It has been returned to ADEQ for changes, and at the time of this report, ADEQ has resubmitted the revised document back to EPA. EPA is currently reviewing the revision. ADEQ has however not issued its concentrated animal feeding operation (CAFO) general permit that expired December 1999. ADEQ is waiting for the EPA general CAFO permit for Oklahoma and New Mexico, which may be issued during mid CY2003. EPA understands ADEQ's approach to using the EPA Region 6 general permit as a template, and EPA encourages ADEQ to parallel EPA in issuance of the CAFO general permit.

- a. Number of facilities covered by a general permit, issued by the State as of October 31, 2002, and currently in effect are outlined below.

ARKANSAS FY2002 NPDES PROGRAM REVIEW

GENERAL PERMIT	# FACILITIES (ACTIVE/INACTIVE)	EXPIRATION DATE
Coal Mining Permit (ARG040000)	7/12	January 31, 2005
Petroleum Storage Permit (ARG0340000)	42/21	March 31, 2005
Backwash Filters (ARG0640000)	121/29	October 31, 2004
Carwash Permit (ARG0750000)	26/46	July 31, 2004
Sanitary Landfills (ARG160000)	28/7	August 31, 2004
Pipeline Hydrostatic Testing (ARG6700 000)*	0	May 31, 2003
Groundwater Cleanup Permit (ARG0079000)	10/53	January 31, 2006
Individual Treatment (ARG055000)	63/9	April 30, 2003
CAFO (ARG001000)**	37/0	December 31, 1999
Storm Water Construction (ARR10A000)	639/166	June 30, 2003
Self Service Laundromats (ARG190000)	2/0	September 30, 2003
Storm Water Industrial (ARR00A000)	1545/4	March 31, 2005

* Authorizations issued for one-time discharge, no numbers available.

**ADEQ will adopt EPA's CAFO permit when it is reissued.

G. PUBLIC PARTICIPATION

1. Number of public hearings held. - One, El Dorado Chemical Company.
2. List of permits where hearing was requested. - One, El Dorado Chemical Company.
3. List changes in public participation policies, practices, and procedures since last end-of-year review with summary. - None

H. ADEQ PRETREATMENT PROGRAM

As has been the case for some time, the ADEQ has only two people primarily devoted to its Pretreatment Program. The numbers for the activities that are presented below represent excellent accomplishments for such a limited staff.

1. Overview

- a. The ADEQ Pretreatment Program Coordinator, Mr. Allen Gilliam, has been an able and hard working force for the program for many years. Mr. Gilliam does a great job and is a valuable member of not only the Arkansas and Region 6 pretreatment efforts, but also frequently contributes on significant pretreatment matters of national interest. He has demonstrated excellent leadership and involvement with state counterparts and with the national pretreatment program. He also conducts the pretreatment program audits/municipal pollution prevention assessments (MPPAs) with skill and knowledge, and the subsequent reports are very informative. Pollution prevention (P2) and waste minimization is being actively promoted during the audits and in other activities where this would be appropriate. Mr. Gilliam has been making good progress toward eliminating the backlog of pretreatment program modifications. His work is to be commended.
- b. Mr. Rufus Torrence is responsible for dealing with the Categorical Industrial Users (CIUs) discharging regulated process wastewater to non-pretreatment city's wastewater treatment plants. He has continued to modify and expand an electronic tracking and data entry system to keep up with the CIUs in the Arkansas non-pretreatment cities. This system tracks the compliance of these facilities and appears to be able to generate permits which could be issued to these CIUs to effectively assure their compliance with the national standards.

2. Outreach

The ADEQ pretreatment program has expanded the outreach activities this past year. There are three separate activities that are worthy of mention and are commendable.

- During April 2002 there were 12 "Silver and Mercury Best Management Practices Workshops" held. These were held at three different times during each day in four different cities around the state.
- During September 2002 there were three "Pollution Prevention (P2) and Wastewater Treatment Options Workshops" held in three different cities on different days.
- The pretreatment portion of the ADEQ website has been established and presents much valuable information, even though it is still in a stage where items are added over time.

3. Permit Review

The following permits were reviewed at the end-of-year meeting.

AR0020702	Batesville	No issues.
AR0021580	Osceola	No issues.
AR0022187	Clarksville	Clarksville has had the programmatic and regulatory portions of their Pretreatment Program modification approved. They are now working on updating their technically based local limits and will submit that portion for a subsequent modification to their pretreatment program. Public Notice (PN) planned for January 2003.
AR0022560	Blytheville	Blytheville has continued to work on their modification and should be nearing the approval stage. PN planned for January 2003.
AR0033359	Conway	No issues.
AR0033880	Hot Springs	Hot Springs has had their pretreatment program modification approved.
AR0043401	Jonesboro	No issues.
AR0033758	Fordyce	No issues.
AR0035483	Hatfield	No issues.
AR0036692	Mena	No issues.
AR0043613	Magnolia	No issues.

4. Action Items

- a. The pretreatment programs for Blytheville, Conway, DeQueen and Rogers, have not been modified to bring them into compliance with the current general pretreatment regulations (40 CFR 403). These programs need to be brought under an adequate control mechanism to assure that the modifications are prepared and submitted in a timely manner. Progress has been made in this area and needs to continue. Additionally, the pretreatment program modification for Clarksville needs to be finalized. The permit for Rogers has a requirement to complete an approvable pretreatment program modification. This requirement has existed for over two years and there has been no progress on the part of the city. Enforcement action should be requested to facilitate accomplishment of the permit requirement. Since the other four facilities are nearing completion of the modifications, the discussed intent to finalize them would have them finished and to PN with the intent to approve the modifications on the following schedule: Blytheville and Clarksville to

PN in January 2003; DeQueen to PN in February 2003; and Conway to PN in March 2003.

- b. Several of the pretreatment audit reports have taken longer to be finalized and sent out than is desirable. The desired target for issuance of the reports after the physical audit is completed is 45 days. Only one of the reports approximated the target deadline. It is suggested that the physical audits be started earlier in the fiscal year, spread out with approximate dates selected for the completion of the physical visits and the dates are not allowed to “slip” until too late in the year.
- c. To assist ADEQ and the public, it has been suggested that the publicly owned treatment works (POTW) include a hand calculation for one of the pollutants through the entire Technically Based Local Limits (TBLL’s) process and this would also be in keeping with Regional Guidance for calculating the TBLL’s that had been established many years ago. The hand calculation would serve as a template by which an interested individual could follow each pollutant through the entire process.
- d. The pretreatment POTWs are required to do influent and effluent monitoring and are being provided with a suggested table in their re-issued permits that allow them to compare the influent values against the calculated maximum allowable headworks loadings (MAHL’s) they have calculated for their TBLL’s. That comparison would let them know whether the levels of various pollutants they are currently receiving comes close to, or exceeds, the MAHL’s. Similarly, a comparison of the measured effluent values against permit limits or water quality standards for each measured pollutant would allow them to know whether they are close to, or violating, these values. Continued work with the POTWs to utilize this data in this manner would be very beneficial and is encouraged.
- e. ADEQ should begin to issue permits to those CIU facilities discharging to POTWs without an approved pretreatment program which have the greatest probability of being non-compliant. This is also a requirement of Regulation 6, Section 6.203.B. of ADEQ’s WQS. One option to begin this process would be to issue a general permit to one of the most common categories (e.g. Metal Finishers) and for facilities which do not have complicating factors involved such as combined wastestreams.
- f. It is recommended that a current effort be made to discover any additional CIU’s discharging to POTWs without an approved pretreatment program. The newly acquired Arkansas Manufacturer’s Directory which is in

electronic format would be an excellent way to begin this effort. Once such users are confirmed, they could be added to the tracking database.

- g. While known Categorical Industrial User (CIU) facilities discharging to POTW's without an approved pretreatment programs have been tracked for some time, there has been a lack of programmatic commitment to assure that they are compliant with the applicable categorical standards. Additionally, there has not been a recent, extensive survey to identify previously undetected CIU's discharging to POTWs without an approved pretreatment program.

5. Enumerated Activities

- a. Pretreatment modification backlog - programs remaining in the modification submittal, review, and approval process.

Since the FY2001 End-of-Year report progress has continued on reducing the backlog of pretreatment program modifications. There were six modifications that were then in some stage of the modification submittal, review, and approval process and they were: Blytheville, Clarksville, Conway, DeQueen, Hot Springs, and Rogers. The reported status of each of these programs is as follows:

- Blytheville has continued to work on their modification and should be nearing the approval stage. PN planned for January 2003.
- Clarksville has had the programmatic and regulatory portions of their Pretreatment Program modification approved. They are now working on updating their TBLLs and will submit that portion for a subsequent modification to their pretreatment program. PN planned for January 2003.
- DeQueen has made progress on their pretreatment program modification and it is pending what is anticipated to be the final review prior to approval. PN planned for February 2003.
- Hot Springs has had their pretreatment program modification approved.
- As reported previously, the Rogers modification request is substantially complete except for a final TBLL assessment review, but needs to have the entire package submitted and has been reluctant to do that. Enforcement action appears warranted.

- b. Number of ADEQ approved Pretreatment Programs - 24
Number of ADEQ permits with pretreatment implementation language - 35 (i.e. Multiple treatment plants for some approved programs)

I. ADEQ PERMIT FILE REVIEW (ADMINISTRATIVE)

Evelyn Rosborough of the Customer Service Branch, Water Quality Protection Division reviewed the following municipal and industrial permit files using the Agency's permit review checklist to determine if the files contained the material as cited in 40 CFR Part 124 as "applicable to State program."

1. Mid-Year Review

AR0001775 - Union Pacific Railroad Co.
AR0021466 - City of Alma
AR0021601 - City of Searcy
AR0033766 - Paragould City Light, Water and Cable
AR0043826 - Weyerhaeuser Co.
AR0045659 - Welsco, Inc.
AR0048780 - Union Pacific Railroad Co. (South)
AR0049514 - AES Cypress LLC

The mid-year review showed some areas of concern. Several of the files were missing permit information, permit applications and or/draft documentation associated with permits reissuance. These materials are considered a necessary part of the administrative record. A lot of material was loose and not properly filed on the prongs in the folder. Files must be kept complete to assist the public in obtaining information on NPDES permits.

2. End-of-Year Review

AR0020702 City of Batesville
AR0021580 City of Osceola
AR0021661 City of Cabot
AR0043389 City of Helena
AR0043826 Weyerhaeuser Co. D.B.A. Northwest
AR0046507 Arkansas Highway Department - McGee

The end-of-year review showed improvement from the mid-year review. All files that were reviewed contained all necessary information and documentation pertaining to the public noticing and final issuance of permits.

J. ADEQ ADMINISTRATIVE PCS AND RECORDS MANAGEMENT REVIEW

Evelyn Rosborough met with PCS Coordinators David Ramsey and Deb Gerst. Discussion with the PCS coordinators included PCS retrieval process, permit issuance data entry, application completeness and coding of SIC codes.

The Records Management review was conducted by Evelyn Rosborough. She met with Wanda Watson, the new Records Management Manager and Carla Graham, Records Supervisor and gave an overview of how the Program Reviews are conducted. Ms. Watson was formerly with the ADEQ Air Permitting Division. In the near future Wanda would like to implement the imaging process and have all file reviews done via computer and publicly accessed. Evelyn also met Linda Kay Ball and Sherry Hopkins. Sherry Hopkins is the Water Permits newest Secretary II. She is responsible for sending all draft and final permits correspondence to EPA. Linda previously held this position, but has accepted a position with the Storm Water team as the Storm Water Administrative Assistant II.

K. ADEQ PERMIT FILE REVIEW (TECHNICAL)

The technical file review was conducted by Larry Giglio of the NPDES Permits Branch on the following permit files. Unless noted, all permits reviewed are classified as minor facilities. The MOA requires that the review determine that each file at a minimum contain the following:

- Permit application
- Issued permit
- Public notice and fact sheet or statement of basis as applicable
- Discharge monitoring reports for the last three-years
- Inspection reports
- Pertinent correspondence
- Non-compliance reports
- Construction reports
- Logs summarizing violations and actions

1. Mid-Year Review

Union Pacific Railroad	AR0048780	This file has documents listed as Southern Pacific Transportation. The file needs to be reviewed and improperly filed items removed and filed correctly.
City of Plainview	AR0049344	No issues.
AES Cypress LLC	AR0049514	Stream segment number/basin name is inconsistent on both the statement of basis and the permit. The segment number is listed as 6C, and the basin name is the St. Francis. One of these two details is in error.
Arkavalley Airpark	AR0049620	Application lacked the day received.
Green Lake Estates Phase III	AR0049654	No issues.
City of Thornton	AR0035661	No issues.
Tyson Foods Inc - Nashville	AR0041734	No issues.
AR Dept of Corrections	AR0045578	No issues.
Welsco Inc	AR0045659	No issues.
City of Fulton	AR0048810	No issues.
Firestone Building Products	AR0000612	No issues.

The permits reviewed appear to meet the requirements of the NPDES regulations and the CWA. During the mid-year review, EPA noted several items relative to files and the material in them. First was file material that was loose in the files examined. The second item was the use of a "DRAFT" watermark on the statement of basis and the permit, and lastly was the lack of dates on the statement of basis. The issue of loose material in the files is important, since loose items not held in the clips can easily become lost, or misplaced. Eliminating loose material is essential in maintaining an effective program, since missing documents strike at the very core of the need to explain permit actions and decisions. The issue of "DRAFT" watermarks is one of a potential source of confusion for the public reviewing a permit file. Using "DRAFT" on a document implies that there will be a document with "FINAL" on it. The last item deals with dates on documents. Reviewing the files, sometimes there were multiple versions of the same document, e.g., statement's of basis and/or permits. Without a side-by-side comparison of such documents, there was no easy way to determine which was the most recent. While proper file maintenance such as removing older "draft" documents would reduce the confusion, this does not always happen. The use of a

date on each document as it was created would clear up which one is the most recent one.

2. End-of-Year Review

Arkavalley Airpark RSF	AR0049620	No issues.
Weyerhaeuser Co	AR0043826	No issues.
City of Oxford	AR0049701	Comments made during the 30-day PN period. Response to comments was appropriate. No other issues.
City of Lincoln	AR0035246	Comments made during the 30-day PN period. Response to comments appropriate. No other issues.
Voss Truck Port 3	AR0037010	No issues.
Martin Marietta Materials	AR0047198	Comments made during the 30-day PN period. Responses were appropriate. No other issues.
American Fuel Cell	AR0000434	No issues.
Ark Hwy Dept - McGehee	AR0046507	No issues.
City of Diaz	AR0041033	No issues.
Davis Rubber	AR0047422	No issues.
Little Rock WW Utility	AR0040177	Failure to provide public notice regarding changes in permit. A change in the permit conditions was made by letter that did not go through the public notice procedures. This has been brought to the attention of ADEQ, and the action has been noted.

The majority of the permits reviewed appear to meet the requirements of the NPDES regulations and the CWA. The lone exception was the Little Rock Wastewater Utility - Fourche Creek facility where a letter from Chuck Bennett of ADEQ, May 1, 1998, to the facility, removed a permit condition without going through the public notice procedure. The State has been made aware of the requirements, and has informed EPA that it understands the situation. The monitoring requirement may not be subject to anti-backsliding, but the removal of such condition is still subject to the public notice requirements under 40 CFR 122.63. When the items seen at the mid-year review were pointed out to ADEQ, they immediately started to make these changes. The files examined during the

end-of-year review did have nearly all the documents secured by clips. The use of “DRAFT” watermarks was being phased out, and lastly, dates were appearing on documents reducing the potential for confusion. We appreciate ADEQ’s quick attention to these items, and encourage them to keep up the diligence.

3. Public Notice Review

A new aspect of file review started with the end-of-year meeting was that of reviewing permit files of facilities that had comments made during the public notice period. These files are noted above by the statement that comments were made during the 30-day public notice (PN). This review was to ascertain that the issues raised by the commenters were adequately reflected by ADEQ in the response to those comments. The files reviewed showed an excellent reflection of the issue raised, and ADEQ’s comments were specific and comprehensive in their response.

L. ADEQ WHOLE EFFLUENT TOXICITY (WET) FILE REVIEW

The ADEQ Whole Effluent Toxicity (WET) program was evaluated by Anhmai Tran of the NPDES Permits Branch. The evaluation included discussions of specific permits and issues, and a review of the following permit files:

1. Mid-Year Review:

City of Searcy - AR0021601
City of Harrison - AR0034321
City of Berryville - AR0021792
City of Heber Springs - AR0022381
City of Blytheville - South - AR0022578
Entergy AR Nuclear One - AR0001392
Berry Petroleum - AR0000663

City of Berryville’s chronic biomonitoring reports, EPA found the results of toxic levels of chlorine reported between 0.3 mg/L to 0.6 mg/L on the chemical parameters charts. However, the related bio-testing results all passed for toxicity. The accuracies of those testings are questionable. (See Section O. below)

2. End-of-Year Review:

City of Van Buren - North AR0040967
Tyson Foods Inc. - Grannis AR0003018
City of El Dorado - AR 0049743
City of Berryville - AR0021792
City of Siloam Springs - AR0020273
City of Little Rock - Fourche Creek - AR0040177
N Little Rock - WW Utility - Faulkner AR0020303
City of Clarksville - AR0022187
El Dorado Chemical Co., Inc. - AR0000752
City of Alma - AR0021466
City of Forest - AR0020087

City of Van Buren - North and the City of Berryville: The issuance of these permits is waiting on the public notice period to be complete.

El Dorado Chemical Co., Inc.: This facility has demonstrated significant lethal effects and performed a toxicity reduction evaluation (TRE). This facility is reporting high ammonia discharge and WET test failures for both species. The permit requires WET limits with monthly biomonitoring frequency. However, this permit has been appealed. No action has been taken at this time.

Tyson Foods Inc. - Grannis: This draft is also being held at ADEQ due to the nutrient issues. No action has been taken at this time.

City of Little Rock - Fourche Creek: The issuance of this permit is postponed due to the City's petition to remove the Total Residual Chlorine Limitation required in the permit. ADEQ has informed EPA that this permit will be sent for public notice in December.

Discussions with Sarah Clem, Toxicologist with ADEQ about the no observed effect concentration (NOEC) definition. This definition should be included in all permits that required WET Chronic Testings. EPA recently found that this language is occasionally omitted from the drafts.

For the purposes of both the Mid-Year and End-of-Year Program Reviews, all requested permit, WET, correspondence and compliance files were readily made available for review.

M. ADEQ RELATED PERMIT ACTIVITIES

1. ADEQ Program modification/changes since last EOY review. - None
2. ADEQ Variance Requests
 - a. Number of variance requests received, denied, and forwarded to EPA - None
 - b. Number and type reviewed by EPA - variance requests - None
3. New source determinations: - None
4. EPA Requests for Permit Issuance, Reissuance, or Modification
 There have been numerous meetings/requests by EPA, that ADEQ resolve permit issues and reissue the following expired permits as expeditiously as possible.

Georgia Pacific- Crossett (AR0001210)	No change
Alcoa (AR0000582)	No change
West Memphis (AR0022039)	No change
Truman (AR0035602)	No change
Fayetteville (AR0020010)	No change
Reynolds Metal Co- Hurricane (AR0001112)	No change
Ciba Speciality Chemicals (AR0037770)	Not applicable
5. State Administrative or Court Action
 - a. Number of judicial or administrative decisions sent to EPA. - None
 - b. Number of permit appeals. - 2, El Dorado Chemical Co, Remington Arms. El Dorado Chemical is ongoing and Remington Arms has been re-proposed.
6. ADEQ Public Hearings
 Number of public hearings held - 1(El Dorado Chemical Co)
7. Permit Classification - Major/minor

 EPA is responsible for classifying facilities which are identified as NPDES “major” dischargers. All other dischargers shall be classified as NPDES “minor” discharges. EPA shall work with ADEQ in making changes where the data rating sheets reflect that a change needs to be made. The following facilities have been identified during FY2002.

- a. Number of minor to major reclassifications submitted. - 5 upgrades, TPS Dell Power Station AR0049425, Hot Spring Power AR0049611, Duke Energy AR0049735, City of Van Buren AR0040967, and City of Little Rock MS4 ARS000002.
- b. Number of major to minor reclassifications submitted. - 1 downgrade, Tyson Food Grannis AR0003018.

N. AMMONIA LIMITS, DISSOLVED OXYGEN, AND TOXICITY

During 2002, EPA and ADEQ arrived at a mutually acceptable procedure that addresses how permits would protect against stream toxicity due to ammonia discharges. The two Agencies agreed to a process where ADEQ would draft the permit with ammonia limits determined by meeting dissolved oxygen (DO) standards using its DO desktop model. EPA then would review the draft permit, and if the numeric values, adjusted for pH and temperature, in EPA's opinion exceeded the national numeric standard, then EPA would issue to ADEQ a letter of specific objection. Proposed in that specific objection letter would be two options: recommended specific numeric ammonia limits, or a required whole effluent toxicity (WET) limit. The WET limit would also have an "enhanced" test schedule with six (6) tests in a calendar year; four (4) tests in the cooler weather months, and two (2) tests during the warmer weather months. While this procedure addresses the issue of ammonia toxicity, the methodology is not as strong as the adoption of existing national EPA guidelines for specific numeric ammonia limits. In a June 21, 2001 letter from Richard Hoppers, EPA to Chuck Bennett, ADEQ, EPA recommended that ADEQ adopt the 1999 freshwater ammonia criteria. The letter attached both a fact sheet and a table that showed ammonia toxicity levels from ammonia for both various pH and temperature ranges. EPA encourages ADEQ to consider adoption of the aquatic life toxicity numeric criteria and limits for ammonia specified in that memo. If the State does not wish to adopt criteria and limits, ADEQ should implement a permitting strategy that adopts 4 mg/l, 30-day average and 6 mg/l, daily maximum, at the edge of the mixing zone.

O. NUTRIENTS

EPA acknowledges that there is an area wide problem regarding excessive nutrients that needs to be addressed. EPA is aware that this is a complex issue that affects various states. We encourage Arkansas, as well as the other states involved to work on addressing this issue.

P. TOTAL RESIDUAL CHLORINE

Current WQS contained in Regulation 2, specifically Section 2.409, states: “Discharges, shall not be allowed into any waterbody which, after consideration of the zone of initial dilution, the mixing zone and critical flow conditions, will cause toxicity to human, animal, plant or aquatic life, or interfere with propagation, growth and survival of aquatic biota”. In the CPP, Appendix D, Implementation Procedures for Toxic Substances, Section IV. B., establishes control of toxicity for potentially continuous discharges of chlorine by biomonitoring, also known as whole effluent toxicity (WET) monitoring. For permits that have monitoring and reporting for total residual chlorine (TRC), regulations contained in 40 CFR 136.3 require the testing for TRC to be instantaneous, defined as within 15-minutes of sample collection. WET testing is generally based on a flow-weighted composite sample with aliquots taken at specific intervals over a 24-hour period. The composite sample used for the WET test then must be analyzed within 36-hours after the final compositing of the individual aliquots. That situation allows at a minimum 24-hours for the first aliquot to dissipate any residual chlorine prior to the WET testing, and possibly as long as 60 hours before the test is started. The position of EPA is that the State CPP methodology of identifying possible chlorine toxicity must be representative of the actual discharge. Regulations contained in 40 CFR 122.41(j)(1) states that samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The same section states that monitoring results must be conducted according to test procedures approved under 40 CFR Part 136. EPA encourages ADEQ to adopt an implement policy of “no-measurable” TRC in discharges from facilities that use chlorine in their process.

Q. CONCLUSION

1. Strengths

In terms of permit issuance rates, ADEQ operates a very successful program. The combined major-minor backlog is the lowest in the Region. The permits section is a lean, efficient group of dedicated professionals, and they are to be commended. Meetings, conversations, and communication with ADEQ staff are always informative, direct and succinct.

2. Concerns

Problematic issues however need to be addressed in this program. ADEQ needs to address the six chronic backlogged permits. Additionally, ADEQ could vault to the front nationally with either adoption of an ammonia and TRC standard, or implementation plans that address these two pollutants. A phased in, point source, specific nutrient implementation program would also be a large plus for this program. Lastly, ADEQ needs to either amend the CPP and its WQS to allow mixing for selected large volume rivers relative to bacteria concerns (fecal coliform) or issue the City's of Truman and West Memphis permits with bacteria limits.

3. Recommendations Needing Action From ADEQ

The following recommendations need action by ADEQ. This is a summary of items contained in the body of the report. EPA requests that ADEQ review the items listed below and provide a written response within 30 days of receipt of this report, addressing these concerns and a schedule for corrective actions to be taken during FY 2003.

- a. The following six expired permits need to be addressed by upper management at ADEQ. EPA Region 6 requests ADEQ to provide expected issuance dates for the following six expired backlogged permits:

Georgia Pacific- Crossett (AR0001210)
Alcoa (AR0000582)
West Memphis (AR0022039)
Truman (AR0035602)
Fayetteville (AR0020010)
Reynolds Metal Co- Hurricane (AR0001112)
(See Section G.1.a and N.4 for more detail)

- b. The Pretreatment Programs for Blytheville, Conway, DeQueen and Rogers, have not been modified to bring them into compliance with the current General Pretreatment Regulations (40 CFR 403). These Programs need to be brought under an adequate control mechanism to assure that the modifications are prepared and submitted in a timely manner.
(See Section I.a. for more detail)

- c. To ensure the continued success of the pretreatment program and its active role in both State and regional outreach programs and activities, EPA recommends ADEQ cross train additional staff member in the pretreatment program.
(See Section F. for more detail)
- d. Regulation 2, Section 2.305, Short Term Activity Authorization, needs to be reviewed and consideration given to deleting it. The majority of permits identified in the regulations all require a federal permit of some kind. The regulation is contrary to federal regulations.
(See Section E.5. for more detail)
- e. EPA recommends the FY 2003 mid year review be at the offices of ADEQ on Wednesday, April 2, 2003.
(See Section C.4. for more detail)
- f. EPA recommends that ADEQ consider specific numeric ammonia criteria and associated limits. Alternatively, implementation of an ammonia strategy that would require the aquatic life limit of year-round 4/6 mg/l ammonia could be adopted.
(See Section O. for more detail)
- g. EPA recommends implementation of a “no-measurable” strategy for TRC at sites that use chlorine as an effluent treatment.
(See Section Q. for more detail)
- h. As stated in page 18, EPA has made the State aware of the public notice requirements for permit modifications. It is EPA’s understanding that ADEQ will ensure that future major modifications undergo the public participation and EPA approval requirements specified in 40 CFR 122.63.

APPENDIX A FY2003 EXPIRATION & BACKLOG UNIVERSE

<u>Permit #</u>	<u>Facility</u>	<u>Expiration Date</u>
AR0001210	GEORGIA PACIFIC-CROSSETT	October 31, 1991
AR0000582	ALCOA CO-BAUXITE	May 31, 1995
AR0022039	WEST MEMPHIS, CITY OF	August 31, 1995
AR0035602	TRUMAN, CITY OF	October 31, 1996
AR0020010	FAYETTEVILLE, CITY OF	November 30, 1997
AR0001112	REYNOLDS METALS CO-HURRICANE	August 31, 2000
AR0040177	LITTLE ROCK, CITY OF-FOURCHE CREEK	April 30, 2002
AR0003018	TYSON FOODS INC-GRANNIS	May 31, 2002
AR0020303	N LITTLE ROCK WW UTILITY-FAULKNER	September 2002
AR0001392	ENTERGY-ARKANSAS NUCLEAR ONE	October 31, 2002
AR0022292	DECATUR, CITY OF	October 31, 2002
AR0033880	HOT SPRINGS, CITY OF-REGIONAL	November 30, 2002
AR0000388	ENTERGY-RITCHIE PLANT	November 30, 2002
AR0021768	RUSSELLVILLE CITY CORP	January 31, 2003
AR0033359	CONWAY, CITY OF-STONE DAM CREEK	January 31, 2003
AR0043427	WARREN, CITY OF	January 31, 2003
AR0000493	ENTERGY-HARVEY COUCH	January 31, 2003
AR0022063	SPRINGDALE, CITY OF	February 28, 2003
AR0022403	BENTONVILLE, CITY OF	February 28, 2003
AR0036498	BENTON, CITY OF	February 28, 2003
AR0021750	FORT SMITH, CITY OF (MASSARD W)	March 31, 2003
AR0035386	EASTMAN CHEMICAL CO	April 30, 2003
AR0001171	GREAT LAKES CHEMICAL CORP	April 30, 2003
AR0033316	PINE BLUFF WW UTILITY-BOYD PT	April 30, 2003
AR0034002	BRYANT, CITY OF	April 30, 2003
AR0021661	CABOT, CITY OF	May 31, 2003
AR0021776	NASHVILLE, CITY OF	June 30, 2003
AR0033626	MAUMELLE SUBURBAN IMPROVEMENT	June 30, 2003
AR0048801	BARLING, CITY OF	June 30, 2003
AR0021482	VAN BUREN, CITY OF-MAIN PLANT	June 30, 2003
AR0048178	EBF, LLC	July 31, 2003
AR0000647	LION OIL CO-EL DORADO REFINERY	September 30, 2003
AR0043389	HELENA, CITY OF	October 31, 2003
AR0000523	US VANADIUM CORP-STRATCOR	November 30, 2003

APPENDIX B

PRETREATMENT ACTIVITIES

The following activities and the counts given are summations for the entire fiscal year. The following table enumerates each activity during this time period and gives some specific information for each activity.

- Number of subcategory determination requests received and response given - 4
- Number of removal credit requests received - 0
- Number of industrial user FDF variance applications received - 0
- Number of net/gross requests received - 0
- Number of POTWs required to develop pretreatment program or under investigation to develop pretreatment program - 4.
- Number of pretreatment program audits/municipal pollution prevention assessments (MPPAs) physically conducted during this time period. - 5. There have been 2 audit reports completed during this time period.
- Number of pretreatment program annual reports received and reviewed during this time period- 26.
- Number of baseline monitoring reports (BMRs) received from categorical industrial users (CIUs) in non-pretreatment cities - Not reported.
- Number of Semi-Annual Reports received from CIUs in non-Pretreatment cities - Not reported.
- Training done, speeches given, etc.- 18
- Conference calls- 65 - 75
- Meetings - 4
- Communications (e-mails, phone calls and other correspondence)- Too numerous to count.
- Other Activities/Works in Progress - 13

FY2002 END-OF-YEAR PRETREATMENT PROGRAM UPDATE

AGENCY: ADEQ 1 October 2001 - 30 September 2002

Activity	Number This Time Period	Specifics: POTW names and Permit Number, Dates, Explanations, etc.
Modifications Required By Permit	5	Blytheville , AR0022586, effective date - 12/01/00, req'd submittal of program mod's within 6 months. NPDES enforcement division finally coded the report due date into their tracking system; Blytheville , AR0022560, 3/5/02, city re-submitted more complete program mods; Blytheville , AR0022560, 3/27/02, submitted final portion of Program modification (ERP), will have to put the "pieces" together for a formal public notice, approval and incorporation into their NPDES permits; Conway , AR0033359, 5/24/02, submitted final portion of Program modification (TBLL development), will have final meeting with City to determine how this will "fit in" with the rest of their Program mods before public notice, approval and incorporation into their NPDES permit. DeQueen , AR0021733, effective date - 1/1/98, req'd submittal of program mod's within 6 months of effective date. That report date was never entered into the enforcement division's tracking system. The 9/26/01 audit required the mods to be submitted within 60 days.
Modifications Submitted By POTWs	3	Blytheville , AR0022586, submitted an incomplete program mod. on 12/14/01 and later re-submitted more complete program mods; Blytheville , AR0022560, 3/7/02, e-correspondence to city asked for more detailed ERP information, submission almost complete; DeQueen , AR0021733, rec'd mod submittal 11/29/01, substantially complete and pending final review before going to P/N.
Modification Requests Comment Letters To POTWs	1	Blytheville , AR0022560, 3/7/02, e-correspondence to city asked for more detailed ERP information, submission almost complete
Modifications Tentatively Approved & To PN	2	Clarksville , AR0022187, letter of notification of P/N sent 10/9/01, assessment for need of TBLL due by 3/31/02; Hot Springs , AR0033880, letter of notification of P/N sent 10/19/01. This P/N was not made due to admin. oversight 2 nd try at P/N was successful on 12/14/01.
Modifications Formally Approved & Incorporated Into Permit	3	Springdale , AR0022063 sent cover letter (10/5/01) and revised permit pages incorporating program mod.& date; Clarksville , AR0022187; letter of conditional approval sent 12/11/01; final approval pending receipt of adopted ordinance; proof of legal authority adoption rec'd 3/10/02, letter of mod. approval sent 3/20/02 (this is the official incorporation into NPDES permit date), draft submittal of TBLL evaluation rec'd 3/7/02, pending further work, review & approval; Hot Springs , AR0033880, public notice generated no substantive comments, correspondence and mod'd permit pages were sent to city on 2/25/02 notifying Program mods were incorporated into permit on 2/25/02.
Pretreatment Program Development Required By Permit	2	Heber Springs , AR0022381, rev'd 3/22/02 and included Activity requirements to develop an approved Pretreatment Program. They currently have 3 CIUs with minimal flow and metals & are being tracked by our Pretreatment section; Decatur , AR0022292, rev'd 5/21/02, major w/ one SIU (Peterson Poultry) that constitutes 75% of POTWs design flow, will have permit limit for Cu unless retests can show ND, will include pretreatment language with Activity requirements to develop a pretreatment program unless survey of non-domestic dischargers indicates it's unnecessary at this time.
IU Surveys Submitted (Activity #1)	1	Forrest City , AR0020087, Activity #1 rec'd 12/28/01, rev'd 12/31/01, 4 IU questionnaires rec'd, 1 of which is a federally reg'd Metal Finisher (tracked by this section) discharges ~10,000gpd wastewater. Industry survey info matches closely to the Ark. Manufacturers Directory. Sporadic biomonitoring failures (water flea) indicate NH3 (NPDES excursions) to be the possible toxicant. Correspondence sent deleting requirement (Activities #2 thru #7) to develop a Pretreatment Program.
Continuing Activities Submittals	0	
Continuing Activities Approved	1	Forrest City , AR0020087, 3/18/02, sent correspondence deleting requirements to develop an approved Program
Developing Tentatively Approved Programs & To PN	0	

Developing Program Formally Approved & Incorporated Into Permit	0	
Audits/MPPAs Physically Conducted	5	Jacksonville , AR0041335; 12/19-21/01; no apparent problems, small IU community, will not be SNC; Fayetteville , AR0020010, 6/24 - 6/26/02; Blytheville , AR0022560, 7/29-31/02; Searcy , AR0021601, 9/10-12/02; Siloam Springs , AR0020273, 9/24-26/02
Audits/MPPAs Final Reports Sent Out	2	Jacksonville , AR0041335, sent 7/17/02; Fayetteville , AR0020010, sent 8/30/02, no major problems.
PCIs Physically Conducted	13	Pine Bluff , AR0033316, 10/2/01, Clarksville , AR0022187, 10/23/01; Hot Springs , AR0033880, 10/26/01, no problems; Bentonville , AR0022403, 11/07/01; Russellville , AR0021768, 10/9/01; Jonesboro , AR0043401, 1/28-29/02; Little Rock , AR0021806, conducted 3/26/02; Harrison , AR0034321, conducted 6/3/02; DeQueen , AR0021733, conducted 5/15/02; Conway , AR0033359, conducted on 5/15/02; Fort Smith , AR0021750, conducted 6/6/02; Nashville , AR0021776; El Dorado , AR0033723 .
PCI Final Reports Sent Out and Reviewed	13	Pine Bluff , AR0033316, 11/12/01, disagreement between City and inspector over flow monitoring requirements in permit, City addressed it in its response; Clarksville , AR0022187, 11/12/01, no problems or action necessary (NPAN); Hot Springs , AR0033880, NPAN; Bentonville , AR0022403, 11/19/01, NPAN; Russellville , AR0021768, 12/12/01, admin. problems with signatures on SIU inspections, city not SNC; Nashville , AR0021776, sent 1/10/02, rev'd 1/24/02, chain of custody problems, sampling equip. not maintained at an SIU, response rec'd 3/22/02 adequate, no action necessary (NAN); El Dorado , AR0033723, sent 1/6/02, rev'd 1/15/02, no problems apparent, NAN; Jonesboro , AR0043401, sent 2/8/02, rev'd 3/27/02, no problems apparent, NAN; Little Rock , AR0021806, conducted 3/26/02; Harrison , AR0034321, conducted 6/3/02; DeQueen , AR0021733, conducted 5/15/02; Conway , AR0033359, conducted on 5/15/02; Fort Smith , AR0021750, conducted 6/6/02.
Removal Credit Requests Rec'd	0	
Removal Credit Requests Acted Upon	0	
Categorical Determination Requests Received (<i>not official</i>)	4	Remington Arms , AR000163 (direct discharger), 11/20/01, not an official written request but site visit was necessary to determine proper categories under which their processes fell; Clarksville , AR0022187, city found Baldor Electric was phosphatizing during comprehensive IU survey site visits and requested assistance in identifying core operation; Fort Smith , AR0021750 - determination requests for 2 industries..
Categorical Determination Requests Acted Upon	4	Remington Arms ; AR000163, during the site visit it was determined numerous errors were entered into their permit application. Worked with permit engineer to correctly calculate permit limits using the CWF for their various categories, subcategories, unregulated, and dilution streams; Clarksville , AR0022187, ~10/4/01, Baldor Electric, e-mailed both the city and the facility the basis for their processes being covered under CFR 433; Fort Smith , AR0021750 - determination responses for 2 industries..
FDF Variance Requests Received	0	
FDF Variance Requests Acted Upon	0	
Net/Gross Adjustment Requests Received	0	
Net/Gross Adjustment Requests Acted Upon	0	

Permits Reviewed For Appropriate Pretreatment Language	23	<p>Alma, AR0021466, rev'd 10/8/01, will req. Activity I (IU survey) submittal and annual rpt.; Dierks, AR0021709, rev'd 10/9/01, standard pret. language (SPL), 0 SIUs; Bull Shoals, AR0037028, rev'd 11/19/01, minor, 0 SIUs, SPL; Camden, AR0022365, rev'd 1/15/02, no SIUs, standard boilerplate non-pretreatment POTW language; Little Rock - Fourche Creek, AR0040177, rev'd 1/21/02, standard Pretreatment Program implementation language; Lavaca, AR0034070, rev'd 1/23/02, minor w/no SIUs, standard boilerplate non-pretreatment POTW language; El Dorado - South, AR0033723, standard Pretreatment Program implementation language; Gravel Ridge, AR0033642, rev'd 2/26/02, no SIUs, standard boilerplate non-pret. POTW language; Ash Flat, AR0041742, rev'd 5/2/02, minor, no SIUs, no previous permit limit problems, standard non-pret. POTW language included; Mayflower, AR0037206, rev'd 5/7/02, minor, no SIUs, standard non-pret. POTW language included; Decatur, AR0022292, rev'd 5/21/02, major w/ one SIU (Peterson Poultry) that constitutes 75% of POTWs design flow, will have permit limit for Cu unless retests can show ND, will include pretreatment language with Activity requirements to develop a pretreatment program unless survey of non-domestic dischargers indicates it's unnecessary at this time; Harrison, AR0034321, rev'd 5/21/02, has correct pretreatment program implementation language in it including the certification statement requirement that existing local limits are adequate; West Helena, AR0022021, rev'd 5/21/02, major w/ no SIUs, standard non-pret. POTW language included; Blytheville, AR0022578 (South POTW), rev'd 5/21/02, pret. program mods are pending final review and public notice, therefore, language will not be included requiring submittal of further mods, fact sheet will explain further, standard pret. program implementation language remains; N. Little Rock, AR0020303, rev'd 5/21/02, has correct P.P. implementation language in it including the cert. statement requirement that existing local limits are adequate; Runyin SID, AR0038075, rev'd 6/17/02, minor, no SIUs, standard non-pret. POTW language included; Searcy, AR0021601, rev'd 6/17/02, has correct Pret. Prog. implementation language including certification statement requirement that existing local limits are adequate; DeQueen, AR0021733, rec'd 7/26/02, program mods have been received, preliminarily reviewed and are substantially complete. Will make final recommendations to "clean up" some of the general language, go to public notice, approve and then incorporate mods into the NPDES permit; Conway, AR0033359, rec'd 8/2/02, same as above for DeQueen; Wilmot, AR0022144, minor facility, no SIUs, standard non-pretreatment boilerplate language; Mulberry, AR0034932, rec'd 8/23/02, minor facility, no SIUs, standard non-pretreatment boilerplate language; Bentonville, AR0022403, rec'd 9/30/02, standard boilerplate pretreatment implementation language with required certification statement that TBLLs are adequate or that evaluation will take place; Springdale, AR0022063, rec'd 9/30/02, standard boilerplate pretreatment implementation language will be incorporated. Due to the recent (5/00) development of TBLLs, certification statement of adequacy will not be included. .</p>
Annual Reports Received	26	<p>Van Buren, AR0021482, rec'd 10/29/01; Bentonville, AR0022403, rec'd 11/26/01; Jonesboro (CWL), AR0043401, rec'd 12/14/01; Clarksville, AR0022187, rec'd 2/22/02; Harrison, AR0034321, rec'd 3/8/02; Searcy, AR0021601, rec'd 3/5/02; Hot Springs, AR0033880, rec'd 2/5/02; Springdale, AR0022063, rec'd 2/1/02; Rogers, AR0043397, rec'd 1/21/02; Paragould, AR0033766, rec'd 3/15/02; Nashville, AR0021776, rec'd 2/26/02; Jacksonville, AR0041335, rec'd 2/19/02; N. Little Rock, AR0020303, rec'd 3/27/02; Fayetteville, AR0020010, rec'd 5/31/02; Little Rock, AR0021606, rec'd 3/25/02; Alma, AR0021466, rec'd 6/3/02; Pine Bluff, AR0033316, rec'd 2/21/02, (ADEQ internal mail did not route it to this office till 4/1/02); Russellville, AR0021768, rec'd 5/14/02; West Memphis, AR0022039, rec'd 3/29/02; Conway, AR0033359, rec'd 4/23/02; El Dorado, AR0033723, rec'd 4/1/02; Camden, AR0022365, rec'd 6/10/02; Fort Smith, AR0021750, rec'd 9/4/02; Blytheville, AR0022560, rec'd 9/3/02; DeQueen, AR0021733, rec'd 9/3/02; Batesville, AR0020702, rec'd 9/18/02, (program no longer required in NPDES permit, no entry into PCS necessary).</p>

Annual Reports Reviewed	22	<p>Van Buren, AR0021482, rev'd 11/14/01, 12 SIUs (2 CIUs), 1 SNC ; Bentonville, AR0022403, rev'd 11/27/01, 5 SIUs (0 CIUs), 0 in SNC; Jonesboro (CWL), rev'd 12/28/01, 47 SIUs (10 CIUs), 3 SNC; Clarksville, AR0022187, rev'd 3/13/02, 4 SIUs, 2 CIUs, 0 SNC, problems with copper & zinc (residential only); Harrison, rev'd 3/13/02, 5 CIUs, 0 SNC, no problems or action necessary (NPAN); Searcy, AR0021601, rev'd 3/13/02, 14 SIUs, 3 CIUs, 0 SNC, NPAN; Hot Springs AR0033880, rev'd 3/13/02, 14 SIUs, 5 CIUs, 1 SNC, NPAN; Springdale, AR0022063, rev'd 3/15/02, 19 SIUs, 3 CIUs, 1 SNC, NPAN; Rogers, AR0043397, rev'd 3/15/02, 13 SIUs, 6 CIUs, 1 SNC, NPAN; Paragould, AR0033766, rev'd 3/18/02, 13 SIUs, 11 CIUs, 2 SNC, NPAN; Nashville, AR0021776, rev'd 3/18/02, 3 CIUs, 0 SNC, NPAN; Jacksonville, AR0041335, 9 SIUs, 2 CIUs, 0 SNC, NPAN; N. Little Rock, AR0020303, rev'd 4/1/02, 14 SIUs, 1 CIU, 0 SNC, no action necessary (NAN); Fayetteville, AR0020010, rev'd 5/31/02, 11 SIUs, 5 CIUs, 0 SNC, NAN; Little Rock, AR0021606, rev'd 5/31/02, Alma, AR0021466, rev'd 6/3/02, City used to have a Pret. Program and still has annual reporting requirements, will remove this upon permit renewal, 2 non-cat. SIUs, both being surcharged for high strength BOD & TSS; Pine Bluff, AR0033316, 16 SIUs, 7 CIUs, 1 SNC, NAN; Russellville, AR0021768, rev'd 6/5/02, report late (due date for annual report - 2/28/02), 12 SIUs, 2 CIUs, 3 non-Cat SIUs in SNC, 1 contesting publication (?), "proof of publication will be forwarded when this issue is resolved", will talk to NPDES enforcement regarding late report, will be entered as SNC on the "Q"; West Memphis, AR0022039, rev'd 6/7/02, 1 CIU, 8 permitted non-SIUs (should have two new CIUs as TECs, will e-mail w/questions), 0 SNC; Conway, AR0033359, rev'd 6/7/02, 20 SIUs, 10 CIUs, 3 in SNC, NAN; El Dorado, AR0033723, rev'd 6/10/02, 9 SIUs, 5 CIUs, 0 SNC, a few problems with Cu (mostly Inf.) and Hg (both Inf & Eff.) at the South POTW; Camden, AR0022365, rev'd 6/18/02, City used to have a Pret. Program and still has annual reporting requirements, will remove this requirement upon next permit renewal, only 1 non-cat "SIU" (a painting facility) which discharges about 5000 g.p.m.;</p>
Training Done, Speeches Given, Etc	18	<p>SIUs in Non-Pret. POTWs presentation at AMSA/EPA national conference 11/5/01; Rural Water Assoc., Hot Springs, presentation on Drinking Water vs. Water Quality; Presented regulatory viewpoint at ten (10) Pollution Prevention silver / mercury outreach meetings (April 15 thru 25); Presented material related to Mercury issues, the State's WQ criteria and EPA method 1631 at the Hot Springs AWW&WEA Conference (April 29); Gave two (2) presentations regarding "Top 10 Pretreatment Violations" & "Mercury Issues" at the EPA Annual Conference in Tulsa (May 13 thru 16); Presentation on the latest news regarding the Metal Products & Machinery rule at the Arkansas Environmental Federation Water Seminar (June 19); Conducted P2 outreach meetings in Springdale, Little Rock and Jonesboro beginning September 17-20, 2002.</p>
CIU BMRs Received	0	
CIU BMRs Reviewed	0	
CIU Semi-Annual Reports Received	?	Some portion of the 32 categorical industrial users that are tracked have been received, but the exact number was not reported.
CIU Semi-Annual Reports Reviewed	?	
Conference calls	65-75	<p>Region 6 Pollution Prevention; Region 6 Annual Pretreatment Conference Planning; Non-Pretreatment POTW/SIU Guidance planning work group; P2 Silver/Mercury Workshop organization and coordination; CIUs in Non-Pret. POTW guidance material; EPA Region 6 Annual Pretreatment Conference Planning; Most calls were regarding the development of the guidance for "Categoricals in non-Pretreatment Cities"; several were related to Pollution Prevention Activities; most calls were regarding the development of the guidance for "Categoricals in non-Pretreatment Cities"; several were related to P2 activities and the POTW website at the University of Texas at El Paso.</p>
Meetings	4	<p>Alcoa/Reynolds Aluminum & Hot Spgs. County POTW, AR0000868, 10/15/01, on-site visit/discussions about POTW receiving IU's non-contact cooling, boiler blowdown and sanitary wastewater; Ark. Environmental Federation, 10/23/01, WQ and Pollution Prevention discussions; Conway, AR0033359; 10/30/01, WQ and TBLL discussions; ADEQ Inspection and Compliant Tracking Workgroup</p>
e-mails, phone calls advising/requesting	TNTC	

Other Activities/Works in progress	13	<p>Planning pollution prevention workshops for '02; Continue building d-base (Microsoft Access) for Pretreatment and Non-Pret. POTWs w/all pertinent info on inf/eff/sludge, SIUs, etc.; Workgroup for developing national guidance regarding SIUs in Non-Pret. POTWs; Planning group for Region 6 annual Pretreatment conference; Planning committee for annual AWW&AWEA conference in Hot Springs; Planning/coordinating series of P2 grant outreach meetings in 4 cities statewide; Helping to author EPA guidance manual for Categoricals in Non-Pret. Cities; Helping to organize annual EPA conference in Tulsa; Continuing to build Pretreatment database and include information on ADEQ homepage; Planning/coordinating series of P2 grant outreach meetings in 3 cities statewide dealing with the P2 alternatives specific to facilities that may be effected by the new Metal Products and Machinery rule under CFR 438; Helping to author EPA guidance for Categoricals in non-Pretreatment cities; continue building Pretreatment database.</p>
------------------------------------	----	--